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November 4, 2022

- Via Electronic Case Filing and Email -

Honorable Sean H. Lane
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: 96 Wythe Acquisition LLC, Chapter 11– Case No. 21-22108 (SHL)

Dear Judge Lane:

Our firm is co-counsel to Fern Flomenhaft, Esq. on behalf of, among others, Michael Lichtenstein, Toby Moskovits, and Williamsburg Hotel BK LLC. We are writing to join in Ms. Flomenhaft's request, set forth in her letter to Your Honor dated November 3, 2022, for an adjournment of the status discovery conference in the subject case presently scheduled for November 10, 2022.

As Ms. Flomenhaft correctly points out in her letter, she is the attorney who has been directly involved in reviewing and producing documents in response to the Rule 2004 subpoenas served upon our clients by the Trustee. Our firm has been primarily involved on behalf of our clients in other matters pertaining to the case, including a response to the Trustee's motion to reject the management contracts, the turnover of the \$252,100 amount previously escrowed for payment of hotel occupancy taxes and the limited objection we filed yesterday in response to the Trustee's bidding procedures motion. Our knowledge of the documents which Ms. Flomenhaft has thus far produced in response to the Rule 2004 subpoenas is quite limited; in fact, the undersigned was out of the country during the period October 14-28 when an extensive number of documents were produced to Trustee's counsel by Ms. Flomenhaft's office.

Given the foregoing, we respectfully submit that if there is to be a meaningful and productive discovery conference, it is imperative that Ms. Flomenhaft be present for same. Accordingly, we join in Ms. Flomenhaft's request that the discovery conference be adjourned until Ms. Flomenhaft returns from abroad the week of November 14.

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We thank Your Honor for your time and consideration respecting this request.

Respectfully submitted,

/s/ Robert A. Wolf

Robert A. Wolf

RAW:js

cc: By Email

Neil Berger, Esq.
John McClain, Esq.
Fern Flomenhaft, Esq.